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11 *Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee for the Pooling and Servicing
12 Agreement Dated as of August 1, 2005 Park Place Securities, Inc. Asset-Backed Pass-Through
13 Certificates Series 2005-WHQ4*

14 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 WELL'S FARGO BANK, N.A., AS TRUSTEE
16 FOR THE POOLING AND SERVICING
17 AGREEMENT DATED AS OF AUGUST 1,
18 2005 PARK PLACE SECURITIES, INC.
19 ASSET-BACKED PASS-THROUGH
CERTIFICATES SERIES 2005-WHQ4,

Case No.: 3:19-cv-00237-MMD-CSD

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO DEFENDANT'S OPPOSITION AND
COUNTERMOTION [ECF No. 38-39]**

[First Request]

20 Plaintiff,
21 vs.
22 FIDELITY NATIONAL TITLE INSURANCE
23 COMPANY,

24 Defendant.

25 Plaintiff, Wells Fargo Bank, N.A., as Trustee for the Pooling and Servicing Agreement
26 Dated as of August 1, 2005 Park Place Securities, Inc. Asset-Backed Pass-Through Certificates
27 Series 2005-WHQ4 ("Wells Fargo"), and Defendant Fidelity National Title Insurance Company
28 ("Fidelity", collectively, the "Parties"), by and through their counsel of record, hereby stipulate
and agree as follows:

- 29 1. On July 21, 2022, Wells Fargo filed a Motion for Partial Summary Judgment [ECF No.
30 33].
- 31 2. On August 10, 2022, Fidelity filed its Opposition to Wells Fargo's Motion for Partial
32 Summary Judgment [ECF No. 38] and filed a Countermotion for Partial Summary

- 1 Judgment [ECF No. 39].
- 2 3. Wells Fargo's deadline to respond to Fidelity's Opposition is August 24, 2022, while its
3 deadline to respond to Fidelity's Countermotion is August 31, 2022.
- 4 4. Wells Fargo requests a thirty-seven (37) day extension of time to file its response to
5 Fidelity's Opposition to Wells Fargo's Motion for Partial Summary Judgment [ECF No.
6 38] and a thirty (30) day extension of time to file its response to Fidelity's Countermotion
7 for Partial Summary Judgment [ECF No. 39], such that the deadlines shall both fall on
8 September 30, 2022. The extension is requested to afford Wells Fargo's counsel additional
9 time to review and respond to the arguments in Fidelity's Opposition and Countermotion.
- 10 5. Counsel for Fidelity does not oppose the requested extension.
- 11 6. This is the first request for an extension which is made in good faith and not for purposes
12 of delay.

13 **IT IS SO STIPULATED.**

14 DATED this 19th day of August, 2022.

15 WRIGHT, FINLAY & ZAK, LLP

16 /s/ Lindsay D. Dragon
17 Lindsay D. Dragon, Esq.
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19 7785 W. Sahara Ave., Suite 200
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20 *Attorneys for Plaintiff, Wells Fargo Bank,
N.A., as Trustee for the Pooling and Servicing
Agreement Dated as of August 1, 2005 Park
Place Securities, Inc. Asset-Backed Pass-
Through Certificates Series 2005-WHQ4*

DATED this 19th day of August, 2022.

SINCLAIR BRAUN LLP

16 /s/ Kevin S. Sinclair
17 Kevin S. Sinclair, Esq.
18 Nevada Bar No. 12277
19 16501 Ventura Boulevard, Suite 400
Encino, California 91436
20 *Attorney for Defendant, Fidelity National
Title Insurance Company*

23 **IT IS SO ORDERED.**

24 Dated this 22nd day of August, 2022.



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28 UNITED STATES DISTRICT COURT JUDGE